

ORAL ARGUMENT SCHEDULED FOR DECEMBER 15, 2025**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL TREASURY EMPLOYEES UNION,

Plaintiff-Appellee

v.

DONALD J. TRUMP, *et al.*,

Defendants-Appellants.

Case Nos. 25-5157

25-5184

25-5303

**APPELLEES' CONSOLIDATED RESPONSE TO
THE COURT'S NOVEMBER 24 LETTER**

Appellees in the consolidated cases agree with the intended approach to argument that the Court conveyed in its November 24 letter, which is to “treat the three cases together as a single case with multiple arguing counsel for the appellees.”

Consistent with the Court’s suggested format, Appellees jointly propose the following order for their arguing counsel, who they identify pursuant to the Court’s request. As set forth below, Appellees propose that, after the government’s opening presentation, the Court hear from Appellees’ arguing counsel in the two cases involving the Federal Service Labor-Management Relations Statute—starting with the lead

case in this consolidated action, which involves the largest number of federal agency defendants. And then the Court would conclude with Appellee's arguing counsel in the case involving the Foreign Service Act before hearing the government's rebuttal.

Proposed Order of Appellee Arguments and Arguing Counsel

1. Appellee National Treasury Employees Union, Case No. 25-5157 (Paras N. Shah).
2. Appellees Federal Education Association, Federal Education Association—Stateside Region, and Antilles Consolidated Education Association, Case No. 25-5303 (Jason Walta).
3. Appellee American Foreign Service Association, Case No. 25-5184 (Richard Hirn).

Respectfully submitted,

/s/ Paras N. Shah

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November 26, 2025

CERTIFICATE OF COMPLIANCE

I certify this response complies with the typeface and type-style requirements of Federal Rule of Appellate Procedure 32(a)(5)-(6) because it has been prepared in 14-point Century Schoolbook, a proportionally spaced font, and that it complies with the type-volume limitation of Federal Rule of Appellate Procedure 32(a)(7)(b) because it contains 195 words, excluding those words that Federal Rule of Appellate Procedure 32(f) exempts.

/s/ Allison Giles
ALLISON GILES
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